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14 GOOGLE LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN JOSE DIVISION
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19 JOSEPH TAYLOR, EDWARD MLAKAR,
20 MICK CLEARY, EUGENE ALVIS, and
JENNIFER NELSON, individually and on
21 behalf of all others similarly situated,

22 Plaintiffs,

23 v.

24 GOOGLE LLC,

25 Defendant.
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Attorneys for Plaintiffs

Case No. 5:20-cv-07956-VKD

**L.R. 6-2 JOINT STIPULATED REQUEST TO
EXTEND CASE DEADLINES AND CONTINUE
TRIAL DATE; AND [PROPOSED] ORDER**

Judge: Hon. Virginia K. DeMarchi

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Pursuant to this Court’s Case Management Order (ECF No. 99) and Civil L.R. 6-2, Plaintiffs Joseph Taylor, Mick Cleary, and Jennifer Nelson (“Plaintiffs”) and Defendant Google LLC (“Google”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, counsel for the Parties are also litigating the *Csupo et al. v. Google LLC* matter (“*Csupo*”) in the Superior Court of Santa Clara County (Complex Division) before Judge Charles F. Adams, which raises materially the same claims as those at issue here;

WHEREAS, on January 27, 2025, the Court largely approved the Parties’ joint request to modify the case schedule in its Order re: Stipulation to Modify Case Schedule (ECF No. 164), adjusting deadlines associated with class certification, summary judgment, and expert challenges, and setting the Final Pretrial Conference on March 4, 2026 and trial for April 1-14, 2026;

WHEREAS, on July 18, 2025, the Parties stipulated to the following modified dates and deadlines, which were approved in the Court’s July 21, 2025 scheduling order (ECF No. 207): (i) Class Certification and Expert Challenge Replies due July 29, 2025; (ii) Class Certification and Expert Challenges Hearing on August 19, 2025; (iii) Motions for Summary Judgment due October 3, 2025; (iv) Motions for Summary Judgment Oppositions due October 31, 2025; (v) Motions for Summary Judgment Replies due November 21, 2025; and (vi) Motion for Summary Judgment Hearing on December 16, 2025;

WHEREAS, at the August 19, 2025 Class Certification and Expert Challenges Hearing, Plaintiffs informed the Court and Google of their intent to seek a stay of this case in light of Google’s appeal of the jury verdict in *Csupo*;

WHEREAS, on August 29, 2025, Plaintiffs filed the above-referenced Motion for a Stay and noticed a hearing on said motion for October 7, 2025;

WHEREAS, on August 29, 2025, Plaintiffs filed an Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed with respect to the Motion for a Stay, and Google’s deadline to file a statement and/or declaration in support of sealing is, under the Civil Local Rules, September 5, 2025;

WHEREAS, under the Civil Local Rules, Google’s opposition to the Motion for a Stay is

1 due September 12, 2025, Plaintiffs' reply in support of the Motion for a Stay is due September 19,
 2 2025, and the hearing is set for October 7, 2025—four days *after* the current October 3, 2025
 3 deadline for Summary Judgment Motions;

4 **WHEREAS**, at the August 19, 2025 Class Certification and Expert Challenges Hearing,
 5 the Parties informed the Court that they would confer regarding potential case schedule
 6 adjustments, in light of the Court's concern regarding the short timeframe to resolve pending
 7 motions in advance of the Parties' Summary Judgment deadlines in October 2025;

8 **WHEREAS**, the Parties have been conferring regarding case schedule adjustments in
 9 *Taylor* to accommodate the Parties' briefing on the Motion for a Stay and extensive post-trial
 10 briefing in *Csupo*, and to allow for greater time for the Court to rule on the Motion for a Stay and,
 11 as applicable, the Class Certification Motion and Expert Challenge Motions, in advance of the
 12 Parties' Summary Judgment deadlines;

13 **WHEREAS**, the Parties agree that good cause exists to grant the requested extensions and
 14 adjustments to the case schedule so that the Court has sufficient time to consider various
 15 submissions, and so that the Parties can prepare and present the most helpful briefing to this Court
 16 on their pending and forthcoming motions, and prepare adequately for trial, should the case proceed
 17 to trial;

18 **NOW, THEREFORE**, the Parties, by and through their respective counsel, stipulate and
 19 request that the following revisions be made to the case schedule:

Event	Current Deadline	Stipulated Deadline
Statement/Declaration re: Sealing re: Motion to Stay	September 5, 2025	September 19, 2025
Response to Statement/Declaration re: Sealing re: Motion to Stay	September 9, 2025	September 23, 2025
Motion to Stay Opposition	September 12, 2025	September 16, 2025
Motion to Stay Reply	September 19, 2025	September 23, 2025

Event	Current Deadline	Stipulated Deadline
Hearing on Motion to Stay	October 7, 2025	No change
Motions for Summary Judgment	October 3, 2025	January 9, 2026
Motions for Summary Judgment Oppositions	October 31, 2025	February 20, 2026
Motions for Summary Judgment Replies	November 21, 2025	March 20, 2026
Motion for Summary Judgment Hearing	December 16, 2025	April 14, 2026 or thereafter (subject to the Court's availability)
Final Pre-Trial Conference	March 4, 2026	June 15, 2026
Trial	April 1, 2026	July 13, 2026 or thereafter (subject to the Court's availability)

IT IS SO STIPULATED.

Dated: September 5, 2025

Respectfully submitted,

COOLEY LLP

By: /s/ Whitty Somvichian

Whitty Somvichian

Attorney for Defendant
GOOGLE LLC

1 Dated: September 5, 2025

KOREIN TILLERY LLC

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3 By: /s/ Marc Wallenstein
4 Marc Wallenstein

5 Attorney for Plaintiffs
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ATTESTATION OF CONCURRENCE IN FILING

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, the undersigned hereby attests that concurrence in the filing of this document has been obtained.

Dated: September 5, 2025

COOLEY LLP

/s/ Whitty Somvichian

Whitty Somvichian

Attorneys for Defendant
GOOGLE LLC

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

The Honorable Virginia K. DeMarchi
United States District Judge

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